

WK/AB:JRS
F. #2022R01025

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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File Date: January 6, 2023
Case Number: 23-cr-00010
Judge Rachel P. Kovner
Magistrate Judge James R. Cho

UNITED STATES OF AMERICA

INDICTMENT

- against -

ADDERLY RAFAEL SANTOS
FAMILIA,

Defendant.

Cr. No. _____
(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(C),
853(a), 853(p), 952(a), 960(a)(1), 960(b)(3)
and 970; T. 18, U.S.C., §§ 2 and 3551 et
seq.)

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THE GRAND JURY CHARGES:

COUNT ONE
(Importation of Cocaine)

1. On or about December 14, 2022, within the Eastern District of New York and elsewhere, the defendant ADDERLY RAFAEL SANTOS FAMILIA, together with others, did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(3); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWO
(Possession of Cocaine with Intent to Distribute)

2. On or about December 14, 2022, within the Eastern District of New York and elsewhere, the defendant ADDERLY RAFAEL SANTOS FAMILIA, together with others, did knowingly and intentionally possess with intent to distribute a controlled

substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Sections 853(a) and 970, which require any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a), 853(p) and 970)

A TRUE BILL



FOREPERSON

By: Amy Buse, Assistant United States Attorney
BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2022R01025
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT
EASTERN *District of NEW YORK*
CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ADDERLY RAFAEL SANTOS FAMILIA,

Defendant.

INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(C), 853(a), 853(p), 952(a),
960(a)(1), 960(b)(3) and 970; T. 18, U.S.C., §§ 2 and 3551 et seq.)

A true bill.

James Krug

Foreperson

Filed in open court this _____ day,
of _____ A.D. 20 _____

Clerk

Bail, \$ -----

James R. Simmons, Assistant U.S. Attorney (718) 254-7511